

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	:	
	:	CHAPTER 13
FRANKLIN A. BENNETT III	:	
	:	
Debtor	:	BANKRUPTCY NO. 19-10350 (ELF)
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**RESPONSE OF LEILA REYES TO DEBTOR’S MOTION FOR SANCTIONS AND TO
DISMISS**

Movant, LEILA REYES (hereinafter, the “Respondent”), by and through her counsel, Maschmeyer Marinas P.C., hereby responds to above referenced Motion for Sanctions as follows:

1. Admitted.
2. Admitted
3. Admitted in part and Denied in part. It is admitted that Creditor did not perform a bankruptcy search on the Debtor. It is denied that Respondent was required to do said search.
4. Admitted to the extent that Respondent via of her counsel did receive the letter
5. Denied as Stated. It is admitted that Exhibit B, which is a case management order of the State Court, was sent to the Debtor by order of the State Court Judge. It is denied that there has been any other contact with the Debtor.
6. Denied
7. Denied
8. This averment is a conclusion of law to which no responsive pleading is required.
Denied as Stated.

9. This averment is a conclusion of law to which no responsive pleading is required.
Denied as Stated.

10. This averment is a conclusion of law to which no responsive pleading is required.
Denied as Stated.

WHEREFORE, Respondent respectfully requests that this Motion be denied

Respectfully submitted,

MASCHMEYER MARINAS P.C.

By: /s/ Paul B. Maschmeyer
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Dated: June 25, 2019

